

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10964 (MG)

Jointly Administered

CELSIUS NETWORK LIMITED and
CELSIUS KEYFI LLC,

Plaintiffs,

v.

JASON STONE and KEYFI INC.,

Defendants.

Adversary Proceeding
No. 22-01139 (MG)

**JOINT STIPULATION ND ORDER REGARDING DEADLINE TO CONSENT TO
HAVE TRIAL CONDUCTED BY BANKRUPTCY COURT**

This stipulation and agreed order (the “Stipulation and Order”) is entered into by and among Plaintiffs Celsius Network Limited and Celsius KeyFi LLC (the “Plaintiffs” or “Celsius”), and Defendants Jason Stone and KeyFi Inc. (the “Defendants” and together with the Plaintiffs, the “Parties”) in the above-captioned adversary proceeding (the “Adversary Proceeding”). Each of the Parties agrees and stipulates to the following:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network, Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); and Celsius US Holding LLC (7956). The location of Debtor Celsius Network LLC’s principal place of business and the Debtors’ service address in these chapter 11 cases is 121 River Street, PH05, Hoboken, New Jersey (07030).

WHEREAS, on August 23, 2022, Plaintiffs filed an adversary complaint (the “Complaint”) in the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”) against Defendants;

WHEREAS, on October 13, 2022, Celsius filed an Amended Complaint against Defendants in the Adversary Proceeding asserting claims for turnover, conversion, fraudulent misrepresentation, breach of fiduciary duty, unjust enrichment, replevin, and accounting;

WHEREAS, on December 22, 2022, Defendants filed their Answer to the Amended Complaint asserting a right to a Jury Trial;

WHEREAS, under the circumstances identified in Bankruptcy Rule 9015, and pursuant to Local Rule 9015-1, the parties may consent to a jury trial in front of the Bankruptcy Court by “filing a statement of consent to a jury trial” within fourteen days from the “service of the last pleading”;

WHEREAS, the Parties have discussed their respective rights to a jury trial, *vel non*, given the nature of the dispute, and subject to a reservation of their respective rights relating thereto and under Rule 9015, wish to extend the period of time provided under Local Rule 9015-1;

WHEREAS, the Parties now jointly submit this Stipulation and Order and respectfully request that the Bankruptcy Court approve the stipulation set forth below.

IT IS THEREFORE STIPULATED, AGREED AND ORDERED THAT:

1. The deadline contemplated under Local Rule 9015-1 is extended through and including January 26, 2023.

SO STIPULATED:

Dated: January 5, 2023

/s/ Mitchell P. Hurley
AKIN GUMP STRAUSS HAUER & FELD LLP
Mitchell P. Hurley
Dean L. Chapman Jr.
One Bryant Park
New York, New York 10036
Telephone: (212) 872-1000
Facsimile: (212) 872-1002
Email: mhurley@akingump.com
dchapman@akingump.com

/s/ Kyle W. Roche
KYLE ROCHE P.A.
Kyle W. Roche
260 Madison Ave., FL 8
New York, New York 10016
Email: kyle@kyleroche.law

Counsel to Jason Stone and KeyFi Inc.

– and –

Elizabeth M.D. Scott (admitted *pro hac vice*)
2300 N. Field Street, Suite 1800
Dallas, Texas 75201
Telephone: (214) 969-2800
Facsimile: (214) 969-4343
Email: edscott@akingump.com.com

Counsel to Celsius KeyFi LLC and Celsius Network Limited

IT IS SO ORDERED:

Dated: January 6, 2023
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge